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Attorneys for ROE CL Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

This Document Relates to:

*Jane Roe CL 183 v. Uber Technologies, Inc.,
et al., No. 3:25-cv-05733-CRB*

*Jane Roe CL 184 v. Uber Technologies, Inc.,
et al., No. 3:25-cv-05855-CRB*

*Jane Roe CL 186 v. Uber Technologies, Inc.,
et al., No. 3:25-cv-06086-CRB*

**ATTORNEY JENNIFER S. DOMER'S
DECLARATION REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH COURT'S OCTOBER 23, 2025
ORDER**

Courtroom: 6 – 17th Floor

I, Jennifer S. Domer, declare as follows:

1. I am an attorney at Cutter Law P.C. admitted to practice before the courts of the State of California. I am a Partner at Cutter Law, P.C., and am one of the counsels of record for all filed Jane Roe CL claimants. I have personal knowledge of the matters set forth herein, and if called to testify, I would testify competently as to the information below.

2. This declaration is made pursuant to the Court's Order to submit a Declaration within 28 days of the Order (November 20, 2025, being 28 days from October 23, 2025, the date the Order was signed) as to whether Counsel disagrees with any Plaintiff inclusion in Uber's

1 Declaration, which Defendants submitted on November 13, 2025.

2 3. Counsel's firm has made extensive efforts to reach clients listed as Exhibit A,
3 subject to Defendants' Motion to Dismiss.

4 4. Counsel submitted a response to the Opposition Motion on October 10, 2025, and
5 explained we would continue to make efforts to reach any missing claimants.

6 5. Those efforts include extensive phone calls, text messages, emails, physical
7 mailings to last known address, and additional address searches in databases. Counsel has also
8 employed a private investigator to help locate these individuals. Through the database searches
9 and private investigators, Counsel also attempted to reach potential relatives in an effort to reach
10 the Plaintiffs.

11 6. Through those continued efforts, Counsel received the Fact Sheet for Jane Roe
12 CL 184.

13 7. Counsel submitted the PFS for Jane Roe CL 184 on November 12, 2025, prior to
14 the submission of Defendant's Declaration filed on November 13, 2025.

15 8. Though late, the submission of their deficiencies is still prior to the Court entering
16 an Order for Dismissal.

17 9. Counsel would therefore dispute their inclusion on Uber's current list of deficient
18 PFSs for their Motion, as well as ask for their exclusion on the Court's future entry of Dismissal.

19 I declare under penalty of perjury that the foregoing is true and correct, and that this
20 declaration was executed on November 20, 2025, in Sacramento, California.

21
22 Dated: November 20, 2025

CUTTER LAW P.C.

23
24 By: /s/ Jennifer S. Domer

25 Jennifer S. Domer
26 Attorney for Jane Roe CL Plaintiffs
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